

Exhibit 2

From: Geraldine W. Young
Sent: Friday, March 29, 2024 2:57 PM
To: SALEM, Sara; 'Audrey Moore'; Zeke DeRose III; Jonathan Wilkerson; Alex J. Brown; Marc B. Collier; John McBride; Peter M. Hillegas; Trevor E. D. Young (trevor.young@oag.texas.gov); Noah Heinz; Zina Bash; Joseph M. Graham Jr.; Ashley Keller; Brooke Smith; jdugan@dugan-lawfirm.com
Cc: SESSIONS, Justina (JKS); Bradley Justus; Paul Yetter; Bracewell, Mollie; MAHR, Eric (EJM); MCCALLUM, Robert; ELMER, Julie (JSE); John Harkrider; Daniel Bitton; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli; Bryce Callahan; EWALT, Andrew (AJE)
Subject: RE: State of Texas v Google - Deposition Notices

Counsel,

See below bates numbers for documents referencing and/or associated (custodian) with Mr. Brin and Pichai. As we discussed and you acknowledge in your email below, this is meant only as a sampling of documents, is not all of the documents the States have identified, and is without prejudice to the States presenting additional documents to the Court, if needed, and in any depositions.

- Brin: GOOG-NE-01787563; GOOG-TEX-01068770
- Pichai: GOOG-DOJ-19087611; GOOG-DOJ-28505483; GOOG-DOJ-AT-01901774; GOOG-AT-MDL-016678498; GOOG-DOJ-16537021

From: Geraldine W. Young
Sent: Thursday, March 28, 2024 8:25 AM
To: SALEM, Sara <Sara.Salem@freshfields.com>; 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (trevor.young@oag.texas.gov) <trevor.young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenker.com>; jdugan@dugan-lawfirm.com
Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

Confirmed that we are still conferring, including on dates for their depos in lieu of the noticed dates. Thanks, Geraldine

From: SALEM, Sara <Sara.Salem@freshfields.com>
Sent: Wednesday, March 27, 2024 11:09 PM
To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson

<Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (trevor.young@oag.texas.gov) <trevor.young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; idugan@dugan-lawfirm.com

Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Geraldine –

Thank you for meeting and conferring with us today regarding Plaintiffs deposition notices to Mr. Brin and Mr. Pichai. To make sure we are all on the same page, I write to confirm our discussion re timing of Google's motion for a protective order.

Plaintiffs agreed to provide, by Friday, a sampling of documents that they believe support their position that Mr. Brin and Mr. Pichai have unique personal knowledge about the DoubleClick acquisition. We expressed concern about waiting that long to move because Plaintiffs noticed Mr. Brin's deposition for April 3. Plaintiffs confirmed that the April 3 date is a placeholder, and they are willing to work with Google on reasonable dates. Plaintiffs agreed that if we wait for them to send us a sampling of documents, Plaintiffs will not then argue that Google's motion is untimely.

We write to confirm our agreement that Plaintiffs will hold the April 3 and April 10 deposition notice dates for Mr. Brin and Mr. Pichai in abeyance while we continue to meet and confer regarding these depositions. Please confirm no later than 12:00 CT tomorrow.

Best,
Sara

Sara Salem
Senior Associate
[T +1 202 777 4529](tel:+12027774529) | [M +1 202 853 0381](tel:+12028530381)

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>
Sent: Wednesday, March 27, 2024 2:18 PM
To: SALEM, Sara <Sara.Salem@freshfields.com>; 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (trevor.young@oag.texas.gov) <trevor.young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; idugan@dugan-lawfirm.com

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Subject: RE: State of Texas v Google - Deposition Notices

We are available at 4 CT today.

From: SALEM, Sara <Sara.Salem@freshfields.com>

Sent: Wednesday, March 27, 2024 10:06 AM

To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (<trevor.young@oag.texas.gov>); Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com
Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

We would like to meet and confer again regarding your deposition notices to Mr. Brin and Mr. Pichai. Are you available to discuss today between 3-5pm CT / 4-6pm ET?

Thanks,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Sent: Friday, March 22, 2024 6:37 PM

To: SALEM, Sara <Sara.Salem@freshfields.com>; 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (<trevor.young@oag.texas.gov>); Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com
Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

We can talk at noon on Monday. Thanks, Geraldine

From: SALEM, Sara <Sara.Salem@freshfields.com>

Sent: Friday, March 22, 2024 10:30 AM

To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; 'Audrey Moore'

<Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (trevor.young@oag.texas.gov) <trevor.young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com
Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

Hi Geraldine –

We are available to meet and confer Monday at 8am CT or 12pm CT.

Thanks,
Sara

Sara Salem
Senior Associate
T +1 202 777 4529 | M +1 202 853 0381

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>
Sent: Friday, March 22, 2024 8:51 AM
To: SALEM, Sara <Sara.Salem@freshfields.com>; 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (trevor.young@oag.texas.gov) <trevor.young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com
Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com; dpearl@axinn.com; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>
Subject: Re: State of Texas v Google - Deposition Notices

Sara - That time does not work for us today. We can talk Monday afternoon or Tuesday morning - let us know times that work then.

Thanks, Geraldine

From: SALEM, Sara <Sara.Salem@freshfields.com>
Sent: Thursday, March 21, 2024 6:45:42 PM
To: 'Audrey Moore' <Audrey.Moore@LanierLawFirm.com>; Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>;

Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor E. D. Young (<trevor.young@oag.texas.gov> <trevor.young@oag.texas.gov>); Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; idugan@dugan-lawfirm.com <jdugan@dugan-lawfirm.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Cc: SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; jhunsberger@axinn.com <jhunsberger@axinn.com>; dpearl@axinn.com <dpearl@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

[External Email – Use Caution]

Counsel –

We would like to meet and confer with you regarding your deposition notices to Mr. Brin and Mr. Pichai. We will respond separately regarding the other notices that you served on Tuesday night.

Are you available tomorrow between 3 and 4 CT?

Best,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Audrey Moore <Audrey.Moore@LanierLawFirm.com>
Sent: Tuesday, March 19, 2024 9:40:18 PM
To: Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; dpearl@axinn.com <dpearl@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; Bryce Callahan <bcallahan@yettercoleman.com>
Cc: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor Young <trevor.young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; idugan@dugan-lawfirm.com <jdugan@dugan-lawfirm.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>
Subject: RE: State of Texas v Google - Deposition Notices

The Plaintiff States hereby serve the attached Notices of Deposition in the *State of Texas et al. v. Google LLC* case, No. 4:20-cv-00957-SDJ.

While the Plaintiff States have included dates, times, and locations for the noticed depositions, they are willing to confer and work with Google on different dates, times, and locations as long as the depositions take place well in advance of the fact discovery cutoff.

Thank you.

Zeke DeRose III



Audrey Moore
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Audrey Moore - Paralegal p: 713-659-5200 w: www.LanierLawFirm.com

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